

**EXHIBIT R**



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March 23, 2006

**VIA FACSIMILE AND U.S. MAIL**

W. Daniel Boone, Esq.  
Weinberg, Roger & Rosenfeld  
1001 Marina Village Pkwy, Suite 200  
Alameda, CA 94501-1091

**Re: SEIU, Local 715 - Carol Harry Grievance**

Dear Mr. Boone:

I am in receipt of your letter dated March 3, 2006 and received on March 8, 2006, in which you contend that this case is factually indistinguishable from one decided earlier and that timeliness therefore should not be at issue. In order that the Hospital might consider your contention, and make a determination whether or not to proceed on the issue of timeliness, I hereby make to you, as counsel to the Union, the following request for information from the Union on behalf of the Hospital. Please provide the following:

- A copy of the envelope in which the November 11, 2005 letter from Laurie Quintel was received, making sure to retain the original.
- A copy of any log or other record maintained showing the date of receipt of correspondence by the Union which lists the November 11, 2005 letter from Laurie Quintel.
- A copy of the transmittal fax cover sheet, transmittal letter or memo, or other document accompanying the letter when it was transmitted from the Stanford University office of the Union to the San Jose office or other location, to K.C. Snodgrass or any other union representative, for handling and processing. If transmitted by fax or e-mail, a copy of the received e-mail or fax, and if by U.S. Mail, please provide a copy of the envelope in which it was transmitted. Please note that the Union may redact from the copy any substantive information relating to the grievance, etc., from such transmittal letter, fax transmittal sheet or letter, or e-mail copy.

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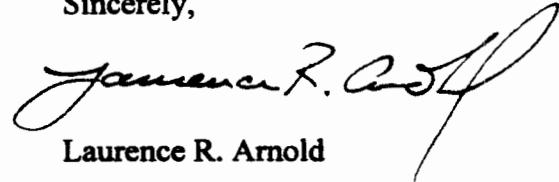
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**FOLEY**

W. Daniel Boone, Esq.  
March 23, 2006  
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Your prompt response is necessary if we are to select a date from among those offered by Arbitrator Chertkov, as we will be unable to know whether witnesses will be available on the offered dates until we know whether we will continue on with the timeliness arbitration, or will proceed on the merits.

Sincerely,



Laurence R. Arnold

LRA/sey

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